AUDIT REPORT FOR ISRAEL

May 29 through June 14, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Israel's poultry inspection system from May 29 through June 14, 2001. Nine of the fifteen establishments certified to export poultry to the United States were on-site audited. Two of these were slaughter establishments; the other seven were processing operations.

The last audit of the Israeli poultry inspection system was conducted in May 2000. Eight establishments were audited. Establishments 9, 52, 104, 108, and 186 were acceptable: two establishments (3 and 19) were recommended for re-review, and Establishment 5 was determined unacceptable. The major concerns from the previous audit were the following:

- 1. Verification procedures for effective HACCP monitoring were inadequate in all establishments.
- 2. The zero-tolerance policy for visible fecal material on carcass was not enforced in Establishments 3, 5, 9, 11, 14, 18, and 19.
- 3. Requirements for "Pre-shipment review" of documents pertaining to the monitoring of critical limit and, if appropriate, corrective actions when taken, including the proper disposition of the product were not met in all establishments.
- 4. Gross product contamination and lack of a single standard for SSOPs or equivalent procedures, and inadequate rodent and pest control programs in Establishment 5.
- 5. The required intralaboratory check samples were not conducted for hormones, trace elements, chloramphenicol, sulfonamides, or antibiotics, chlorinated hydrocarbons and organophosphates.

All of the deficiencies stated above were verified during this audit to have been corrected. The Israeli inspection service had cancelled U.S. export eligibility/listing of Establishments 5, 11, and 14 for non-compliance of requirements.

Israel exports only poultry processed products to the United States. Restrictions are placed on Israeli fresh poultry due to presence of Newcastle disease. Meat products are ineligible because USDA does not recognize Israel's meat inspection system as equivalent.

During the period of January 1 to April 30, 2001, Israeli establishments exported 889,566 pounds of processed turkey and chicken product to the U.S. There were no rejections at port-of-entry reinspection.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Israeli national poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the poultry inspection headquarters facilities preceding the on-site visits. Establishments 22, 52, 101, 104, 108, 119, and 219 were selected randomly for on-site-audits. Establishments 3 and 19 were included for on-site audit for being marginally acceptable (recommended for re-review) during the previous FSIS audit. Establishments 9, 18, 118, 186, and 209 were selected for record reviews. The third was conducted by on-site visits to establishments. The fourth was a visit to three laboratories, one performing analytical testing of field samples for the national residue testing program, and the other two culturing field samples for the presence of microbiological contamination with *Salmonella* and *Escherichia coli* (*E. coli*).

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Emphasis was placed on Israel's national residue monitoring program, and verification of Israeli response to FSIS questionnaire on residues. It included discussions, records audit in the testing/monitoring laboratories, and on-site visit to a Turkey Farm to verify use, control and monitoring of prescription drugs or chemical feed additive or pre-mixes.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Nine establishments (3, 19, 22, 52, 101, 104, 108, 119, and 219) were audited; all were acceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

As stated above, major concerns had been identified during the last audit of the Israeli poultry inspection system conducted in May 2000. During this new audit, the auditor determined that all those concerns had been addressed and corrected.

During this new audit, a few deficiencies were noted. These variances have been discussed under the <u>Sanitation Controls</u>, <u>Residue Controls</u>, <u>Slaughter/Processing Controls</u>, and <u>HACCP</u> Implementation sections later in this report. No serious deficiencies were observed.

Entrance Meeting

On May 29, an entrance meeting was held in Beit Dagan with Dr. Eliezer Nili, Director, Control of Animal Products; Dr. Michael Hirik, Area Supervisor, Southern District; Dr. Karol Vigvari, Area Supervisor, Northern District; and Dr. Eliezer Wittman, HACCP Project Manager and Dr. Hussain Magsi, International Audit Staff Officer. Topics of discussion included the following:

- 1. Updates on the inspection system of Israel
- 2. The audit itinerary and travel arrangements
- 3. Delistment issues
- 4. Generic E. coli and Salmonella and Listeria testing and species verification program.
- 5. HACCP implementation
- 6. SSOP implementation

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Israel's inspection system in May 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications lead the audits of the individual establishments. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the Ministry of Agriculture and Rural Development in Tel Aviv and in the establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Label approval records such as generic labels.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.

 Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result of the examination of these documents.

- *Listeria monocytogenes* in ready-to-eat product, and residues in slaughtered poultry were determined to be "not reasonably likely hazard to occur" but justification for not being a Critical Control Point (CCP) was not documented in all establishments.
- HACCP plan did not adequately describe preventive measures to be used to preclude recurrence of process control variances in a CCP in all establishments visited.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Israel as eligible to export poultry products to the United States were full-time government employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Fifteen establishments were certified to export poultry products to the United States at the time this audit was conducted. Nine establishments (Ests. 3, 19, 22, 52, 101, 104, 108, 119, and 219) were visited for on-site audits. All establishments were acceptable with minor deficiencies. Corrective actions were prompt and effective.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

- 1. Government oversight of accredited, approved, and private laboratories.
- 2. Intra-laboratory quality assurance procedures, including sample handling.
- 3. Methodology.

The official National Residue Control Laboratory, Kimron Veterinary Institute in Beit Dagan was visited on May 29, 2001. Two accredited private microbiological testing laboratories for *Salmonella*, and *E. coli* in Tirat Carmel (Institute for Food Microbiology and Consumer Goods), and in Nes Ziona (Bacto-Chem) were audited on June 6 and June 13 respectively. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery

frequency, and percent recovery. The methods used for the analyses were acceptable. No compositing of samples was done.

The Laboratory Quality Assurance program in official and private laboratories complies with Israeli national accreditation-body requirements.

The microbiological testing for Salmonella was being performed in private laboratories. In the private laboratories visited, the auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

- 1. The laboratories were accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
- 2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- 3. Results of analyses were being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Kosher- turkey slaughter and cut-up – Establishments 3 and 19.

Kosher - Cooked sausages, cured and smoked products – Establishments 22, 52, 104, 108, 119, and 219.

Cooked Kosher and non-Kosher sausages, cured and smoked products – Establishment 101.

SANITATION CONTROLS

Based on the on-site audits of establishments, Israel's inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; sanitizers; separation of operations; pest control and monitoring; temperature control; lighting; work space; ventilation; maintenance and cleaning of over-product ceilings and equipment; dry storage areas; personal dress, habits, and hygiene; equipment sanitizing; product handling, storage, and transpotation; antemortem facilities; welfare facilities; and outside premises.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements. However, following deficiencies were noted.

- In Ests. 3 and 19, at the "re-conditioning station" for fecal contamination, contaminated carcasses and other carcasses (for economic trimming) were not adequately segregated resulting in unsanitary conditions.
- In Est. 52, several product-holding metal racks had accumulations of grease and chemical/hard water residues.
- Ceiling and/or ceiling panels in Ests. 3, 52, 101, and 108 were in poor condition.

ANIMAL DISEASE CONTROLS

Israel's inspection system had controls in place to ensure adequate animal identification, antemortem and post-mortem inspection procedures and dispositions, humane handling and slaughter, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were no reported outbreaks of animal diseases with public-health significance since the previous U.S. audit.

There were adequate animal identification and traceback, humane handling and slaughter of animals and control of condemned products.

RESIDUE CONTROLS

Israel's National Residue Testing Plan for 2000 was being followed and was on schedule. The Israeli inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. However, several outdated (expired) antibiotics screening kits (CHARM-II method) were in storage and were being used for antibiotic screening. It was stated to be an inadvertent error and the kits were removed immediately.

During the visit to a farm, no deficiencies were observed. No improper drug usage was detected and all animals treated were identified and held segregated for the proper withdrawal period before being sent to slaughter. A quality assurance program was in place in the laboratories that were audited and it was effective. Stock solutions were dated and recorded and were periodically checked by supervisors for proper strength and expiration dates. The results of the tests were reported to the establishments and to the government inspection office in a timely manner.

SLAUGHTER/PROCESSING CONTROLS

Israel's inspection system had controls in place to ensure adequate animal identification; antemortem inspection procedures; antemortem disposition, humane slaughter; postmortem

inspection procedures; postmortem dispositions; condemned product control; restricted product control; ingredients identification; control of restricted ingredients; formulations; processing schedules, equipment and records, and processing controls of cured, dried, smoked products and cooked sausages. However, in Establishment 19 there were excessive turkey pinfeathers on the finished product and an effective carcass re-inspection program was not in place. In Establishment 3, at the postmortem inspection station, a guide-bar was not provided to facilitate postmortem inspection.

HACCP Implementation

All establishments approved to export poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were audited and found to meet the basic FSIS regulatory requirements, however, the following variances were noted during this audit in all establishments:

- *Listeria monocytogenes* in ready-to-eat product and residues in slaughtered poultry were determined "not reasonably likely hazard to occur" but justification for not being a Critical Control Point (CCP) was inadequate and/or not documented.
- The HACCP plans did not adequately describe preventive measures to be used to preclude recurrence of process control variances in all CCPs.

Testing for Generic E. coli

Israel has adopted the FSIS regulatory requirements for *E. coli* testing. Seven of the nine establishments audited were required to meet the basic FSIS regulatory requirements for generic *E.coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing program was audited and found to meet the basic FSIS regulatory requirements.

Additionally, establishments had adequate controls in place to prevent poultry products intended for Israeli domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, and with the exception of the unacceptable establishment (Est. 5), the GOI inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, importation of only eligible poultry products from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for Salmonella Species

All of the nine establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Israel has adopted the FSIS regulatory requirements for Salmonella testing.

The Salmonella testing programs were found to meet the basic FSIS regulatory requirements.

Listeria monocytogenes Testing

The GOI inspection service has a surveillance program for *Listeria monocytogenes* testing (one sample from each shipment intended for export to the U. S.).

Species Verification Testing

At the time of this audit, Israel was not exempt from the species verification testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements (criteria for sampling: less than 500 kilos one sample, 500 kilos to 5 tons 3 samples, and more than 5 tons 6 samples).

Monthly Reviews

These reviews were being performed by the Inspection Service Area Supervisor. The internal review program was applied equally to both export and non-export establishments. Internal review visits were both announced and not announced in advance, and were conducted, at times, by individuals, and at other times by a team of reviewers, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a commission is empowered to conduct an in-depth review, and the results are reported to the Director of Veterinary Services and Animal Health for evaluation.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certificates, a single standard of control throughout the establishments, inspection supervision as required, and adequate controls for security items, shipment security, species verification, and products entering the establishments from outside sources.

Exit Meetings

An exit meeting was conducted in Beit Dagan on June 14, 2001. The participants included Dr. Oded Nir (Markusfeld), Director of Veterinary Services and Animal Health (VSAH); Dr. Isaac Klinger, Deputy Director, Veterinary Services and Animal Health; Dr. Eliezer Nili, Director, Control of Animal Products; Dr. Karol Vigvari, Area Supervisor, Northern District; and Dr. Eliezer Wittmann, HACCP Project Manager; and Dr. Hussain Magsi, International Audit Staff Officer. The following audit findings as detailed in the body of the report were discussed.

- 1. In all establishments, *Listeria monocytogenes* in ready-to-eat product, and residues in slaughtered poultry were determined "not reasonably likely hazard to occur" but justification for not being a Critical Control Point (CCP) was inadequate and/or not documented. Also the HACCP plans did not adequately describe preventive measures to be used to preclude recurrence of process control variances in all CCPs.
- 2. In the following establishments, the SSOPs did not reflect actual sanitation controls, and/or effectiveness of the performance standards for sanitation, equipment and facilities:
 - In Ests. 3 and 19, at the "re-conditioning station" for fecal or ingesta contamination, the contaminated carcasses were not handled sanitarily to preclude cross contamination.
 - In Est. 52, several product-holding metal racks had accumulations of grease and chemical/hard water residues.
 - The ceilings or ceiling panels in Ests. 3, 52, 101, and 108 were in poor condition.

3. In Establishment 3, at the postmortem inspection station, a guide-bar was not installed for conducting proper inspection. Also in Ests. 3 and 19, there were excessive turkey pinfeathers on finished product, and an effective carcass re-inspection program was not in place.

The inspection service officials stated that they would be closely monitoring the agreed upon steps by the establishments to ensure that corrective actions and preventive measures would be implemented, as promised during the audits and exit meetings in the individual establishments.

CONCLUSION

Nine establishments were audited; all were acceptable with minor deficiencies. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction. The inspection officials reinforced the assurances made by field personnel during and at the conclusions of the on-site audits of the establishments, and stated that they would ensure prompt compliance.

(signed)Dr. Hussain Magsi

Dr. Hussain Magsi International Audit Staff Officer

ATTACHMENTS

- A. Data collection instrument for SSOPs
- II. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing.
- D. Data collection instrument for Salmonella testing
- E. Laboratory Audit Forms
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report (no comments received)

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

- 1. The establishment has a written SSOP program.
- 2. The procedure addresses pre-operational sanitation.
- 3. The procedure addresses operational sanitation.
- 4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
- 5. The procedure indicates the frequency of the tasks.
- 6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
- 7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
- 8. The procedure is dated and signed by the person with overall on-site authority.

*The results of these evaluations were as follows:

Est.#	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. Identified	7. Documentation done daily	8. Dated and signed
3	V	V	$\sqrt{}$	V	$\sqrt{}$	V	V	√
19	V	√	$\sqrt{}$	√	V	V	√1	V
22	V	√	$\sqrt{}$	√	$\sqrt{}$	V	$\sqrt{}$	$\sqrt{}$
52	V	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	V	$\sqrt{}$	$\sqrt{}$
101	V	√	$\sqrt{}$	√	$\sqrt{}$	V	$\sqrt{}$	V
104	V		$\sqrt{}$		$\sqrt{}$	V	$\sqrt{}$	$\sqrt{}$
108	V		$\sqrt{}$		$\sqrt{}$	V	$\sqrt{}$	$\sqrt{}$
119	V	√	V	√	$\sqrt{}$	V	$\sqrt{}$	V
219	V	V	V	V	V	V	V	V

^{*}Individual plant variances are discussed under SSOPs

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. Identified	7. Documentation done daily	8. Dated and signed
9		$\sqrt{}$	$\sqrt{}$		$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$
18		$\sqrt{}$	$\sqrt{}$		$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$
118		$\sqrt{}$	$\sqrt{}$		$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$
186	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$
209	V	V	V	V	V	V	V	V

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

- 1. The establishment has a flow chart that describes the process steps and product flow.
- 2. The establishment had conducted a hazard analysis.
- 3. The analysis includes food safety hazards likely to occur.
- 4. The analysis includes the intended use of or the consumers of the finished product(s).
- 5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
- 6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
- 7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
- 8. The plan describes corrective actions taken when a critical limit is exceeded.
- 9. The HACCP plan was validated using multiple monitoring results.
- 10. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
- 11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
- 12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagra m	2. Haz- ard an- alysis	3. All hazard s ident- ified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazard s	7. Mon- itoring is spec- ified	8. Corr. act's are des- cribed	9. Plan valida- ted	10.Ad e- quate verific. proced -ures	11. Ade- quate docu- menta- tion	12. Dat-ed and signed
3	√	V	√*	V	V	√*	√	√ **	√	√	√	V
19	√	√	√*	V	√	√*	√	√ **	√	√	√	V
22	√	√	√*	V	√	√*	V	√ **	√	V	√	√
52	√	√	√*	√	√	√*	√	√ **	√	√	√	V
101	√	√	√*	V	√	√*	V	√ **	√	V	√	√
104	√	√	√*	√	√	√*	√	√ **	√	√	√	$\sqrt{}$
108	√	√	√*	V	√	√*	V	√ **	√	V	√	V
119	√	√	√*	V	√	√*	V	√ **	√	V	√	V
219	√	√	√*	√	√	√*	√	√ **	√	√	√	√

^{*} Listeria monocytogenes in ready-to-eat product, and residues in slaughtered poultry were determined "not reasonably likely hazard to occur" but justification for not being a Critical Control point (CCP) was not documented.

^{**} HACCP plan did not adequately describe preventive measures used to preclude recurrence of process control variances in all CCPs.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	1. Flow diagram	2. Haz- ard an- alysis	3. All hazards ident- ified	4. Use & users includ- ed	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. act's are des- cribed	9. Plan valida- ted	10.Ade- quate verific. procedu res	11.Ade- quate docu- menta- tion	12. Dated and signed
9	√	√	√*	√	√	√*	√	√ **	√	√	√	√
18	√	√	√*	√	√	√*	√	√ **	√	√	√	√
118	√	√	√*	√	√	√*	√	√ **	√	√	√	√
186	√	V	√*	V	V	√*	V	√ **	V	√	√	V
209	√	√	√ *	V	V	√ *	V	√ **	√	√	√	V

^{*} *Listeria monocytogenes* in ready-to-eat product, and residues in slaughtered poultry were determined "not reasonably likely hazard to occur" but justification for not being a Critical Control point (CCP) was not documented.

^{**} HACCP plan did not adequately describe preventive measures used to preclude recurrence of process control variances in all CCPs.

Data Collection Instrument for Generic E. coli Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

- 1. The establishment has a written procedure for testing for generic E. coli.
- 2. The procedure designates the employee(s) responsible to collect the samples.
- 3. The procedure designates the establishment location for sample collecting.
- 4. The sample collection is done on the predominant species being slaughtered.
- 5. The sampling is done at the frequency specified in the procedure.
- 6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
- 7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
- 8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
- 9. The results of the tests are being recorded on a process control chart showing the most recent test results.
- 10. The test results are being maintained for at least 12 months.

The results of these evaluations were as follows:

Est.#	1.Writ- ten pro- cedure	2. Sampler designated	3.Samp- ling lo- cation given	4. Pre- domin. species sampled	5. Sampling at the req'd freq.	6, Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 vr
3		$\sqrt{}$	√	V	1	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	$\sqrt{}$	√
19			$\sqrt{}$	$\sqrt{}$		$\sqrt{}$		$\sqrt{}$	$\sqrt{}$	$\sqrt{}$

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

The results of these evaluations were as follows:

	1.Writ-	2. Samp-	3.Samp-	4. Pre-	5. Samp-	6, Pro-	7. Samp-	8. Using	9. Chart	10. Re-
	ten pro-	ler des-	ling lo-	domin.	ling at	per site	ling is	AOAC	or graph	sults are
Est. #	cedure	ignated	cation	species	the req'd	or	random	method	of	kept at
			given	sampled	freq.	method			results	least 1 yr
9	$\sqrt{}$									
18		V			$\sqrt{}$		$\sqrt{}$			$\sqrt{}$
22	V	V	V	V	V	V	V	V	V	V

Data Collection Instrument for Salmonella testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

- 1. Salmonella testing is being done in this establishment.
- 2. Carcasses are being sampled.
- 3. Ground product is being sampled.
- 4. The samples are being taken randomly.
- 5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
- 6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

	1. Testing as	2. Carcasses	3. Ground	4. Samples	5. Proper site	6. Violative
Est. #	required	are sampled	product is	are taken	and/or	est's stop
			sampled	randomly	proper prod.	operations
3	$\sqrt{}$	$\sqrt{}$	N/A	V	$\sqrt{}$	$\sqrt{}$
19	√	V	N/A	√	√	√

- 1. One Salmonella sample from ready to eat product from each shipment to be exported.
- 2. One Salmonella sample from raw ground product per week.
- 3. One Salmonella sample from raw ground product from each batch.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

	1. Testing as	2. Carcasses	3. Ground	4. Samples	5. Proper site	6. Violative	
	required	are sampled	product is	are taken	and/or	est's stop	
Est.#			sampled	randomly	proper prod.	operations	
9	$\sqrt{}$	$\sqrt{}$	N/A	$\sqrt{}$	\checkmark	$\sqrt{}$	
18	V	$\sqrt{}$	N/A	V	$\sqrt{}$	$\sqrt{}$	
22	V	V	N/A	V	V	V	